

**Appendix A to the Declaration of E. Evans Wohlforth, Esq.**

<b>Document Title/ECF No.</b>	<b>Basis for Sealing</b>	<b>Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted</b>	<b>Why a Less Restrictive Alternative to the Relief Sought is Not Available</b>	<b>Any Prior Order Sealing the Same Materials in the Pending Action</b>	<b>Party in Opposition to Sealing, if any, and Basis</b>
Letter dated August 12, 2024 [ECF No. 350]	Letter motion contains: (1) references to Save On SP, LLC's ("SaveOn") early business strategy; (2) descriptions of internal SaveOn documents produced during discovery discussing SaveOn's early strategic decisions and operations; and (3) direct quotes from email exchanges between attorneys regarding SaveOn's business operations.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection
Exhibit 4 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 4 is an email thread between SaveOn employees and ESI regarding communications about SaveOn's services with a client.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection

		be disclosed to competitors and other market participants.			
Exhibit 5 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 5 is an email thread between SaveOn employees and ESI regarding SaveOn's business projections and communications with a prospective client.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 6 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 6 is an email thread between SaveOn, ESI and Accredo personnel regarding a perceived competitor and SaveOn's strategy in response to that competitor.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 7 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 7 is letter from Johnson & Johnson Health Care Systems, Inc.'s ("J&J") counsel to SaveOn's counsel that quotes directly from SaveOn documents that discuss SaveOn operations with clients	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection

	and SaveOn's relationship with ESI.				
Exhibit 8 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 8 is an email thread between J&J's counsel and SaveOn's counsel in which SaveOn's counsel provides confidential information regarding SaveOn's business operations and strategies.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 11 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 11 is an internal SaveOn document describing SaveOn's proposed business operations.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 12 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 12 is a PowerPoint presentation describing SaveOn's services and offerings for clients.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection

Exhibit 13 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 13 is an email between Claudia Dunbar and Jill Stearns attaching a document describing SaveOn's business operations and action items.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 14 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 14 is an email from Claudia Dunbar to Gary Meyn discussing SaveOn's marketing strategy and attaching a document identifying a SaveOn client.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 15 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 15 is a PowerPoint presentation regarding SaveOn's launch strategy, operations, and personnel.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 16 to letter dated	Exhibit 16 is an agenda listing topics for discussion between	If relief is not granted, SaveOn would be at a competitive disadvantage	It is believed that no less restrictive alternative is available to prevent the		No objection

August 12, 2024 [ECF No. 350]	senior SaveOn personnel.	should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	disclosure of SaveOn's proprietary business information.		
Exhibit 18 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 18 is a letter from J&J's counsel to SaveOn's counsel which describes and quotes from SaveOn documents that discuss SaveOn's marketing strategies, call center technology, a client identity, staffing needs and internal organization.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 19 to letter dated August 12, 2024 [ECF No. 350]	Exhibit 19 is a letter from SaveOn's counsel to J&J's counsel which describes and quotes from SaveOn documents that include drafts regarding the explanation of SaveOn's services and provides personal details about SaveOn personnel.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 20 to letter dated August 12,	Exhibit 20 is a letter from SaveOn's counsel to J&J's counsel which describes SaveOn documents and provides	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to		No objection

2024 [ECF No. 350]	personal details about SaveOn personnel.	non-public business information and strategy be disclosed to competitors and other market participants.	prevent the disclosure of SaveOn's proprietary business information.		
Letter dated August 22, 2024 [ECF No. 354]	Letter opposition contains descriptions of SaveOn documents that include presentations about SaveOn's operations and details of SaveOn's correspondence with a manufacturer.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No.	No objection
Exhibit 2 to letter dated August 22, 2024 [ECF No. 354]	Exhibit 2 is a contract between ESI and SaveOn describing in detail the partnership between the two entities.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection
Exhibit 5 to letter dated August 22, 2024 [ECF No. 354]	Exhibit 5 is an email from SaveOn's founder and an accompanying PowerPoint describing SaveOn's services.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection

		be disclosed to competitors and other market participants.			
Exhibit 6 to letter dated August 22, 2024 [ECF No. 354]	Exhibit 6 is an email from SaveOn's founder discussing SaveOn's operations.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.		No objection